

Anthony S. Newman  
Direct Phone: +1 213 457 8123  
Email: anewman@reedsmith.com

355 South Grand Avenue  
Suite 2900  
Los Angeles, CA 90071-1514  
Tel +1 213 457 8000  
Fax +1 213 457 8080  
reedsmith.com

March 17, 2017

**By U.S. Mail and Online Via [foiaonline.regulations.gov](http://foiaonline.regulations.gov)**

Regional Freedom of Information Officer  
United States Environmental Protection Agency  
1445 Ross Avenue (6MD-OE)  
Dallas, TX 75202-2733

**Freedom of Information Act Request - U.S. Environmental Protection Agency Region 6**

Dear Regional Freedom of Information Officer:

We appreciate your prompt attention to this request for documents made pursuant to the Freedom of Information Act (the "Act"), 5 U.S.C. § 552. Pursuant to the Act, we respectfully request that the U.S. Environmental Protection Agency ("EPA") produce certain documents in its possession, custody, or control concerning the property located at 114 NE 28th Street, Grand Prairie, Texas, 75050 (the "PROPERTY"). We understand that the PROPERTY also is known as the "Delfasco Forge Site."

Specifically, we request that the EPA produce any and all of the following categories of documents in its possession, custody, or control:

1. Any and all documents relating to the ownership of, and/or operations on, the PROPERTY since 1950.
2. Any and all documents relating to the release or presence of hazardous substances, pollutants, or contaminants on the PROPERTY, including any notices of violations issued by the EPA for the PROPERTY.
3. Any and all documents relating to any investigation, inspection, testing, characterization, monitoring, mitigation, or remediation activities conducted by or on behalf of the EPA or the Texas Commission on Environmental Quality (the "TCEQ") in connection with the PROPERTY.
4. Any and all environmental permits, licenses, and/or certifications issued by the EPA in connection with the PROPERTY.
5. Any and all complaints received or issued by the EPA in connection with the PROPERTY, including all settlements entered into by the EPA concerning the PROPERTY.

For the avoidance of any doubt, this request is not seeking the disclosure of personal identifying information ("PII") or any other information, the disclosure of which would constitute any invasion of personal privacy.

We request that the EPA produce responsive documents in their entirety, including all attachments. In the event the EPA determines that a document contains material or information that falls within a statutory exemption to mandatory disclosure, such as information involving matters of personal privacy, section 522(b) of the Act provides that if some parts of a file are exempt from release, "reasonably segregable" portions of the nonexempt material should be provided. Therefore, if the EPA determines that some of the information requested is exempt from disclosure, please provide a copy of each of the nonexempt documents and portions of documents.

We request that the EPA confirm in writing when it has determined that all documents responsive to this request, or portions thereof, have been furnished or specifically identified and denied under claim of authority pursuant to 5 U.S.C. § 552(b). In the event that the EPA determines that it does not have any documents responsive to this request, or portions thereof, please confirm this in writing as well.

As you may be aware, courts have ruled that agencies refusing to release documents requested pursuant to the Act must prepare and release indices of the documents withheld. Therefore, if the EPA determines that part or all of any document requested herein is exempt from release, please provide an index of the documents the EPA has elected to withhold. We request that such index: (a) be contained in one document and be complete in itself; (b) adequately describe each withheld document or deletion from a released document; (c) state the exemption claimed for each withholding or deletion; (d) explain in detail why the exemption is relevant; and (e) be specific enough to permit a reasoned judgment as to whether the material is actually exempt under the Act.

This is a commercial request. Therefore, Reed Smith LLP agrees to pay all reasonable search, review, duplication and processing fees incurred in connection with this request up to \$500. Please notify me at (213) 457-8123 if you determine that such fees will exceed \$500. Please send copies of all documentation to:

Anthony S. Newman  
Reed Smith LLP  
355 S. Grand Ave., Suite 2800  
Los Angeles, CA 90071  
E-mail: anewman@reedsmith.com

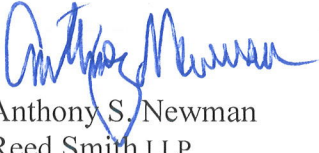
Thank you for your assistance. We look forward to your reply within the statutory twenty (20) business days, as required by the Act. Please contact me at (213) 457-8123 with any questions or if you require any further information which will accelerate the production of responsive information. We are

Regional Freedom of Information Officer  
'March 17, 2017  
Page 3

ReedSmith

open to working with the EPA to receive electronic documents, if that reduces any burden on the Agency. In the event that this request should be directed to another office, please forward it to the proper office and notify me of such transfer.

Very truly yours,



Anthony S. Newman  
Reed Smith LLP

ASN:sd